

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARISKNIGHT ARKIN-EVERETT WINFREE,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT 1
(Kidnapping)

From on or about October 13 to on or about October 14, 2022, in Ingham County, in the Southern Division of the Western District of Michigan,

ARISKNIGHT ARKIN-EVERETT WINFREE

unlawfully seized, confined, inveigled, decoyed, and kidnapped S.D. for ransom, reward, or otherwise using a means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of committing the offense.

18 U.S.C. § 1201(a)(1)

COUNT 2
(Coercion & Enticement)

From in or about September 2022 through in or about October 2022, in Ingham County, in the Southern Division of the Western District of Michigan, and elsewhere,

ARISK NIGHT ARKIN-EVERETT WINFREE

knowingly persuaded, induced, enticed, and coerced S.D. to travel in interstate and foreign commerce to engage in sexual activity for which any person could be charged with a criminal offense.

Specifically, Defendant lured S.D. to travel from Italy to East Lansing, Michigan by posting a false advertisement for au pair services. Once S.D. was in East Lansing, Michigan, Defendant raped S.D., in violation of Michigan Compiled Law § 750.520d.

18 U.S.C. § 2422(a)

COUNT 3

(Attempted Coercion & Enticement)

From in or about July 2022 through in or about September 2022, in Ingham County, in the Southern Division of the Western District of Michigan, and elsewhere,

ARISKNIGHT ARKIN-EVERETT WINFREE

knowingly persuaded, induced, enticed, and coerced A.S. to travel in interstate and foreign commerce to engage in sexual activity for which any person could be charged with a criminal offense.

Specifically, Defendant lured A.S. to travel from Kansas to East Lansing, Michigan by posting a false advertisement for au pair services. Once A.S. was in East Lansing, Michigan, Defendant attempted to coerce and force A.S. to engage in sex acts and/or sexual contact with him, in violation of Michigan Compiled Law § 750.520d and/or Michigan Compiled Law § 750.520e.

18 U.S.C. § 2422(a)

COUNT 4

(Sexual Exploitation of a Minor)

On or about November 30, 2022, in Ingham County, in the Southern Division of the Western District of Michigan,

ARISKNIGHT ARKIN-EVERETT WINFREE

knowingly used, persuaded, induced, and enticed Minor Victim 1 to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, which visual depictions were transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

Specifically, Defendant engaged in sexual acts with Minor Victim 1 and produced a video using his Wyze video camera, which camera was made in China.

18 U.S.C. § 2251(a) and (e)

18 U.S.C. § 2256

COUNT 5

(Sexual Exploitation of a Minor)

On or about December 9, 2022, in Ingham County, in the Southern Division of the Western District of Michigan,

ARISKNIGHT ARKIN-EVERETT WINFREE

knowingly used, persuaded, induced, and enticed Minor Victim 2 to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct, which visual depictions were transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

Specifically, Defendant solicited photos of Minor Victim 2 engaged in sexual acts, which he requested Minor Victim 2 to send him. Minor Victim 2 did so, and sent a video to Defendant using the SnapChat Internet application.

18 U.S.C. § 2251(a) and (e)

18 U.S.C. § 2256

FORFEITURE ALLEGATION
(Coercion & Enticement)

The allegations contained in Counts 2 and 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2428.

Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense in violation of Title 18, United States Code, Section 2422, the defendant,

ARISKNIGHT ARKIN-EVERETT WINFREE,

shall forfeit to the United States of America any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offenses and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses. The property to be forfeited includes, but is not limited to, the following:

1. REAL PROPERTY: 343 Highland Avenue, East Lansing, Michigan 48823, Ingham County, more fully described as LOT NUMBER: 21; SUBDIVISION: REPLAT OF RUFUS BAILEY; CITY/MUNI/TWNSP: EAST LANSING; TRACT: 0040002007; Parcel No. 33-20-01-13-113-015.

2. PERSONAL PROPERTY: Proceeds from the sale of a red 2021, Porsche Boxster VIN WP0CD2A83MS232474; specifically, up to \$89,500, including \$66,854.35 seized on or about January 26, 2023, pursuant to a federal seizure warrant (No. 1:23-mj-00044); a Samsung S22 Ultra phone, with Serial No. R5CR31J1PLP; Wyze Camera System and associated SD cards; red ball gag; handcuffs and keys; and assorted sex toys.

3. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

18 U.S.C. § 2428
21 U.S.C. § 853(p)
18 U.S.C. § 2422

FORFEITURE ALLEGATION
(Sexual Exploitation of a Minor)

The allegations contained in Count 4 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253(a).

Pursuant to 18 U.S.C. § 2253(a), upon conviction of an offense in violation of 18 U.S.C. § 2251 set forth in Count 4 of this Indictment, the defendant,

ARISKNIGHT ARKIN-EVERETT WINFREE,

shall forfeit to the United States of America, any visual depiction described in 18 U.S.C. § 2251; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

1. REAL PROPERTY: 343 Highland Avenue, East Lansing, Michigan 48823, Ingham County, more fully described as LOT NUMBER: 21; SUBDIVISION: REPLAT OF RUFUS BAILEY; CITY/MUNI/TWNSP: EAST LANSING; TRACT: 0040002007; Parcel No. 33-20-01-13-113-015.

2. PERSONAL PROPERTY: Proceeds from the sale of a red 2021, Porsche Boxster VIN WP0CD2A83MS232474; specifically, up to \$89,500, including \$66,854.35 seized on or about January 26, 2023 pursuant to a federal seizure warrant (No. 1:23-mj-00044); a Samsung S22 Ultra phone, with Serial No. R5CR31J1PLP; and a Wyze Camera System and associated SD cards.

3. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

18 U.S.C. § 2253(a), (b)

21 U.S.C. § 853(p)

18 U.S.C. § 2251

FORFEITURE ALLEGATION
(Sexual Exploitation of a Minor)

The allegations contained in Count 5 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253(a).

Pursuant to 18 U.S.C. § 2253(a), upon conviction of an offense in violation of 18 U.S.C. § 2251 set forth in Count 5 of this Indictment, the defendant,

ARISKNIGHT ARKIN-EVERETT WINFREE,

shall forfeit to the United States of America, any visual depiction described in 18 U.S.C. § 2251; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

1. PERSONAL PROPERTY: a Samsung S22 Ultra phone, with Serial No. R5CR31J1PLP.

2. SUBSTITUTE ASSETS: If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

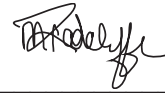
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

18 U.S.C. § 2253(a), (b)

21 U.S.C. § 853(p)

18 U.S.C. § 2251

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



DAVIN M. REUST
Assistant United States Attorney